From:
 Dawn Kirby

 To:
 Benbow, Gene

 Subject:
 Re: 87942-1

**Date:** Thursday, June 27, 2013 1:02:37 PM

Attachments: PestConnect Instruction Manual - Q3 Release 2012 USA version.doc

## Dear Gene

Thank you for sending through the comments for the PestConnect sub-label. Apologies for the short delay - I need to get some clarification about comment (8) in your email below.

Attached is a clean copy of the PestConnect sub-label, with the specified changes made.

See below for some addition information in response to comment (8). The sub-label was not amended in accordance with comment (8), but we can change it if necessary.

Please contact me if you need more information, otherwise I look forward to receiving the authorised copies of the new RADAR labels.

Thank you for your prompt attention regarding this application.

Dawn

Dawn Kirby Senior Regulatory Manager

## Rentokil Initial

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On 19 June 2013 18:39, Benbow, Gene < Benbow.Gene@epa.gov > wrote:

Thank you Dawn! I have just a few label comments for the new sublabel for PestConnect:

- 1. On the front panel please delete "We reserve the right to change the construction and/or configuration....". These type of changes would have to be reviewed by the Agency. The same thing would apply to any rodenticide bait sold with a bait station (i.e. changes to either the bait or station would have to be reviewed by the Agency).
- 2. On page 3 please revise "...Technician visits the customer premise's to clear any mice activity" to "Technician visits the customer premise's to clear the RADAR Connect trap....."
- 3. On page 4 please change "continuous protections" to "continuous protection".
- 4. On page 5 please change "When an activity" to "When activity".
- 5. On page 5 please revise "mains" to "AC powered". Actually, go ahead and replace all of the "mains" with "AC powered".
- 6. On page 10 please revise "so it is important to take time to be happy with the locations you have chosen" to "it is important to position the repeaters in locations that provide a good radio signal".
- 7. On page 14 please revise "However, radio doesn't like going through metal" to "radio signal doesn't easily pass through metal".
- 8. On page 16 the statement "It is important to remember that radio waves do not respect building boundaries. Just because a system is all set up in one building won't mean that it will connect that way" reads a bit confusing. I think I understand that you are trying to say that "the system placed in one building may intercept signals from a system placed in *another* building and vice versa". Is that correct? Maybe something like "it is important to remember that signals from one system may affect signals from another system, particularly if the two systems are placed close to each other".

The statement, on page 16 highlights that if PestConnect systems are installed close to each other then the reporting route back to PNOL (Pest Net On Line website) can be via different control panels in different locations depending on site conditions.

The main point to remember is that each detector has a unique bar code which is registered to a particular client and it's specific location on the client's site. In the event that an activation occurs then it does not matter which control panel is automatically selected as the data route back to the PNOL server.

The site installed detectors will always seek out the strongest signal path back to the control panel - so if this is via another local installation then this will not affect the systems ability to register any change of state and report accordingly into PNOL.

Does this clarify the statement? We believe it does not need to be changed - do you agree?

If you can email me a clean label I'll get it to John for stamping! Let me know if you have any questions about these comments.
Thank you,
Gene Benbow
Biologist
Insecticides-Rodenticides Branch
http://epa.gov/pesticides/
From: Dawn Kirby [mailto:dawn.kirby@rentokil-initial.com] Sent: Wednesday, June 19, 2013 12:39 PM To: Benbow, Gene Subject: Re: 87942-1
Hello Gene
Here are the Pest Connect Manuals, as requested.
Sub-label A is the manual for RADAR (non-radio version)
Sub-label B is the manual for RADAR (Pest Connect version).
We would supply the correct part according to which version of RADAR we are using.
Thanks for the email. Have a nice day.

Dawn Kirby

Senior Regulatory Manager

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On 19 June 2013 13:59, Benbow, Gene < <u>Benbow.Gene@epa.gov</u> > wrote: Hi Dawn,

I have your amendment to add a new instruction manual for the "PestConnect" unit. I spoke with John about this, and we both think it will be more clear if you can provide 2 separate instruction manuals, "sublabel A" for the current (non-radio) manual and "sublabel B" for the new PestConnect manual.

If you can email me both manuals, each alternately marked "sublabel A" and "sublabel B" on the front page I can review/stamp it for you pretty quickly.

Let me know if you have any questions about this -

Thanks,

Gene Benbow

**Biologist** 

Insecticides-Rodenticides Branch

http://epa.gov/pesticides/

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